



MITCHELL SILBERBERG & KNUPP LLP  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Jeffrey M. Movit  
A Professional Corporation  
(917) 546-7708 Phone  
(917) 546-7678 Fax  
jmm@msk.com

August 12, 2020

**VIA ECF**

Hon. Brian M. Cogan, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **Request for Extension of Time to Respond to Complaint**  
**Full Circle United, LLC v. Bay Tek Entm't, Inc., No. 1:20-cv-03395-BMC**

Dear Judge Cogan:

Our law firm has just been retained as counsel for Defendant Bay Tek Entertainment, Inc. ("Bay Tek") in the above-captioned action. We write to request a 30-day extension of time for Bay Tek to move, answer or otherwise respond to the complaint, *i.e.* until September 21, 2020, in order to provide sufficient time to conduct a fact investigation as to Plaintiff's allegations.

There have been no prior requests for extensions of this deadline. Plaintiff does not object to this request. An initial status conference is currently scheduled to take place on September 10, 2020 (ECF No. 6). There are no other deadlines.

We greatly appreciate the Court's consideration of this request.

Respectfully,

/s/ Jeffrey M. Movit

Jeffrey M. Movit  
A Professional Corporation for  
MITCHELL SILBERBERG & KNUPP LLP